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13 UNITED STATES DISTRICT COURT

14 DISTRICT OF ARIZONA

15 In Re Bard IVC Filters Products
16 Liability Litigation

No. MD-15-02641-PHX-DGC

MOTION TO FILE UNDER SEAL

(Filed *Ex Parte*)

19 Plaintiffs' Co-Lead Counsel and Liaison Counsel to the Common Benefit Fee and
20 Cost Committee and the Co-Chairs of the Common Benefit Fee and Cost Committee
21 respectfully move this Court, pursuant to Federal Rule of Civil Procedure 26(c)(1)(G) and
22 Local Civil Rule 5.6 for leave to file under seal Plaintiffs' Revised Motion for Interim
23 Reimbursement of Shared Costs Limited to Capital Contributions ("Revised Motion for
24 Interim Reimbursement") and the Proposed Scheduling Order: Common Benefit Fees and
25 Expense Reimbursement ("Proposed Scheduling Order").

26 The Revised Motion for Interim Reimbursement and Proposed Scheduling Order
27 contain confidential financial information relating to all Participating Counsel as defined
28 in Case Management Order No. 6 (Doc. 372). Furthermore, as the Court is undoubtedly

1 aware, all filings related to the Common Benefit Fee and Cost Committee have been filed
2 under seal in this litigation. Accordingly, good cause exists for sealing the Exhibit.

3 RESPECTFULLY SUBMITTED this 26th day of March 2021.

4 BEUS GILBERT MCGRODER PLLC

5 By: /s/ Mark S. O'Connor

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of March 2021, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jessica Gallentine